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February 21, 2001

cc: Tom
Jean
Mark Reeves

Matt Cusma
Schnitzer Steel Industries
P.O. Box 10047
Portland, Oregon 97296-0047

RE: Crawford Street Corporation Site
8424 and 8524 N. Crawford Street, Portland, Oregon
Revised Sampling and Analysis Plan

Dear Mr. Cusma:

Thank you for submitting the January 26, 2001 revised Preliminary Assessment (PA) Sampling and Analysis Plan (SAP) for the above-referenced site. As discussed during our meeting on January 23, 2001, the Oregon Department of Environmental Quality (DEQ) appreciates the revisions made to the SAP to determine whether a current source and pathway for Willamette River contamination exists at the Crawford Street Corporation (CSC) site. DEQ staff has reviewed the document and has the following comments.

1. General. The SAP states samples will be run for polycyclic aromatic hydrocarbons (PAHs) using EPA Method 8310 or 8270-SIM (Section 5.0). Samples should be analyzed for PAHs using EPA Method 8270-SIM for semi-volatile organic compounds (SVOCs). The 8270 method will detect priority pollutants and potential site contaminants of interest including PAHs, pentachlorophenol, bis(2-ethylhexyl)phthalate, phenols, and dibenzofuran.

2. Sections 2.1.1, 2.1.2, Page 3 and Section 5.1, Page 12. Surface soil samples should also be analyzed for total petroleum hydrocarbons (diesel and oil range) due to the known use of various petroleum products and concern of oily water runoff from the current and historical operations. Note that volatile organic compound (VOC) analysis is not required for these surface soil samples.

3. Sections 2.2.1, 2.2.2, Page 4 and Section 5.2, Page 12. The black sand samples should be analyzed for total petroleum hydrocarbons (diesel and oil range) due to the known presence of petroleum products in the sand. Metal analyses should include priority pollutant metals (Sb, As, Be, Cd, Cr, Cu, Pb, Hg, Ni, Se, Ag, Tl, Zn). If elevated metal concentrations are detected, TCLP analyses should also be performed for metals.

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4. Sections 2.3.1 and 2.3.2. Page 5. Soil and groundwater samples collected from borings PP-1, PP-2, and PP-3 should be analyzed for total petroleum hydrocarbons (diesel and oil range) due to the potential use of petroleum products by the sources being investigated. The locations of these borings should be immediately downgradient of the potential source.

5. Section 2.3.1. A single soil sample within the black sand material should not also be used to evaluate the potential upgradient historical sources (1969 sawmill and planing mill and 1911 and 1924 planing mill). Native soil beneath the black sand fill, particularly at the soil/water interface, would be the likely potential migration pathway from the historical sources to the river and should be evaluated in the field and sampled for laboratory chemical analysis. For PP-1, -2, and -3, the default soil sample location if there is no field evidence of soil contamination should be at the soil/water interface.

6. Section 2.3.2 and 2.3.3. Page 6. The soil and groundwater samples collected from the former foundry/machine shop should be analyzed for priority pollutant metals, TPH (diesel and oil range), VOCs, and SVOCs.

7. Section 2.3.2. Page 6. Due to the volume of water needed for the analyses of contaminants of potential interest, DEQ recommends the installation of temporary well points or small diameter direct push wells.

8. Section 3. Soil and groundwater concentrations should also be compared to DEQ's ecological benchmark screening values.

9. Section 2.4, Page 6 and Section 5.4, Page 14. The soil samples collected from beneath the abandoned pipes should be analyzed for priority pollutant metals, TPH (diesel and oil range), polychlorinated biphenyls (PCBs), and SVOCs. Note that VOC analysis is not required for these surface soil samples.

Revisions to the Sampling and Analysis Plan can be made in letter format, and should be submitted to me along with an implementation schedule by March 23, 2001. Please call me if you have questions.

Sincerely,

Tom Gainer

Tom Gainer, P.E.
Project Manager

DEQ-DC1

cc: Ross Rieke, Bridgewater Group
Rod Struck, DEQ/NWR
Eric Blischke, DEQ/NWR